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June 7, 2024

VIA ECF

Honorable Jennifer M. Rozzoni
United States District Court
District of New Mexico
333 Lomas Blvd NW
Albuquerque, NM 87102

Re: Initiation of Disputes Concerning the Administrative Record in Doe v. U.S. Immigration and Customs Enforcement, No. 23-cv-971 MLG-JMR

Dear Judge Rozzoni:

Pursuant to the Court's Order Setting Litigation Schedule (ECF No. 31, as modified by ECF No. 63), Plaintiffs write to notify the Court that they intend to file motions to complete and/or supplement the administrative record.

Defendants produced an administrative record to Plaintiffs on March 11, 2024. Plaintiffs exchanged correspondence with Defendants and the Parties held multiple meet-and-confers to attempt to resolve disputes concerning the administrative record. Defendants produced a supplemented administrative record on June 4, 2024. However, in Plaintiffs' view, the administrative record remains incomplete, and the Parties have been unable to reach agreement regarding materials that Plaintiffs believe must be included in the administrative record. Additionally, Plaintiffs believe supplementation of the record is necessary and justified under recognized exceptions to the record rule.

Plaintiffs will be prepared to discuss their anticipated motion(s) to complete and/or supplement the record at the June 24, 2024 case management conference (ECF No. 65). Due to the complexity of the issues involved with completion and supplementation of the administrative record, Plaintiffs believe that briefing would assist the Court in deciding this issue. Therefore, Plaintiffs also hope to reach agreement with Defendants on a proposed briefing schedule and to file that proposed schedule with the Court prior to the June 24 conference.

Respectfully submitted,

/s/ Sasha Boutilier

cc: All counsel of record via ECF

quinn emanuel urquhart & sullivan, llp

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